

February 15, 2013

VIA MAIL & E-MAIL: jmorneau@cmolawyers.com

Jeffrey S. Morneau, Esq.
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Springfield, MA 01103

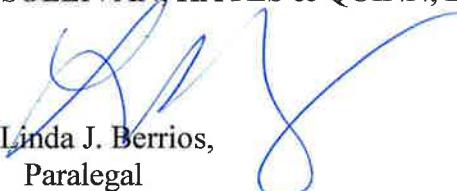
Re: Wendy Anthony v. Mercy Inpatient Medical Associates, Inc.
Civil Action No.: 3:12-CV-30072-MAP
Offer of Judgment

Dear Jeff:

Attached is the Defendant's Offer of Judgment in reference to the above-captioned matter. Kindly provide notice, within fourteen (14) days (**March 1, 2013**), as to whether the Plaintiff will or will not accept the offer of judgment.

Respectfully,

SULLIVAN, HAYES & QUINN, LLC


Linda J. Berrios,
Paralegal

:ljb

Attachment

cc: Nathan Olin, Esq.
Gordon D. Quinn, Esq.
Layla G. Taylor, Esq.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
(WESTERN DIVISION)

WENDY ANTHONY, Individually and on) CIVIL NO. 3:12-CV-30072-MAP
Behalf of all Other Persons Similarly Situated,)
)
)
PLAINTIFF,)
)
)
v.) Judge Michael A. Ponsor
)
)
MERCY INPATIENT MEDICAL)
ASSOCIATES, INC.,)
)
)
DEFENDANT.) Date: February 15, 2013

OFFER OF JUDGMENT

TO: Jeffrey S. Morneau, Esq.
Nathan A. Olin, Esq.
Connor, Morneau & Olin, LLP
73 State Street, Suite 310
Springfield, MA 01103

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendant hereby offers to allow judgment to be entered against it in this action for a total gross sum of One Hundred and Forty Thousand Dollars and Zero Cents (\$140,000.00) for compensatory, statutory damages, liquidated damages, punitive damages and reasonable attorneys' fees, litigation expenses and costs of suit incurred by Plaintiff in relation to this case. Such amount shall be apportioned between and among the named Plaintiff, Wendy Anthony, and members of the preliminarily certified class.

This offer of judgment is made for the purposes specified in Federal Rule of Civil Procedure 68, and shall not to be construed as either an admission that Defendant is liable in this

action, or that Plaintiff and/or members of the preliminary certified class have suffered any damage.

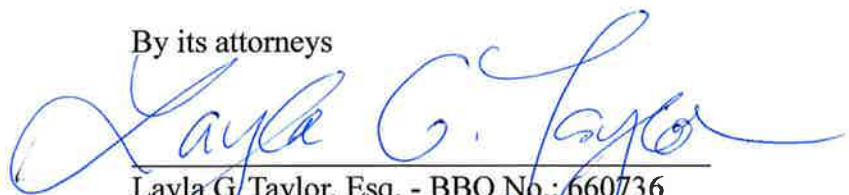
This offer of judgment is intended to resolve all of Plaintiffs' claims on behalf of herself and the class members in this action, including without limitation any and all claims for compensatory damages, statutory damages, liquidated and/or punitive damages and attorneys' fees and costs.

Respectfully submitted,

The Defendant,

MERCY INPATIENT MEDICAL
ASSOCIATES, INC.

By its attorneys



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